IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

SHANE GALITSKI, RICHARD TALIAFERRO and BRIAN NEWBOLD, Individually and on behalf of All Others Similarly Situated,	§ § § § §	
Plaintiffs,	§ §	**CIVIL ACTION NO.**
v.	§ §	**3:12-CV-4782-D**
SAMSUNG TELECOMMUNICATIONS AMERICA, LLC,	§ § § §	
Defendant.	§	

APPENDIX IN SUPPORT OF SAMSUNG TELECOMMUNICATIONS AMERICA, LLC'S RESPONSE TO PLAINTIFFS' MOTION TO EXCLUDE OPINIONS OFFERED BY DESIGNATED EXPERTS JOSEPH MCALEXANDER, ABHIRAM REDDY YERRAMADDU AND JAY AMIN

Jeffrey M. Tillotson, P.C. (jtillotson@lynnllp.com)
Texas State Bar No. 20039200
John Volney (jvolney@lynnllp.com)
Texas State Bar No. 24003118
Alan Dabdoub (adabdoub@lynnllp.com)
Texas State Bar No. 24056836
LYNN TILLOTSON PINKER & COX, L.L.P.
2100 Ross Avenue, Suite 2700
Dallas, Texas 75201
(214) 981-3800 Telephone
(214) 981-3839 Facsimile

ATTORNEYS FOR DEFENDANT
SAMSUNG TELECOMMUNICATIONS
AMERICA, LLC

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#4814-2076-8289

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

SHANE GALITSKI, RICHARD TALIAFERRO and BRIAN NEWBOLD, individually and on behalf of all others similarly situated,	§ § § § §	
Plaintiffs,	§ §	CIVIL ACTION NO.
vs.	§ §	3:12-cv-04782-D
SAMSUNG TELECOMMUNICATIONS AMERICA, LLC, a Delaware limited liability company,	§ § § §	
Defendant.	§ §	

DECLARATION OF ABHIRAM REDDY YERRAMADDU

I, Abhiram Reddy Yerramaddu, hereby declare as follows:

1.   My name is Abhiram Reddy Yerramaddu. I am over eighteen years of age and I would be competent to testify as to the matters set forth herein if I am called upon to do so. I have personal knowledge of the facts stated herein.

2.   I am a Senior System/Software Test Engineer with Samsung Electronics America, Inc. ("Samsung").[1] I earned a Bachelor's degree in computer science from PRRM Engineering College in Hyderabad, India in May 2006, and a Master's degree in computer science from Jackson State University in May 2010.

3.   I am a technical expert in testing the performance of Samsung smartphones, including the Samsung Galaxy S Fascinate model, sold by Verizon, and the Samsung Galaxy S

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[1]   Samsung Telecommunications America, LLC merged with Samsung Electronics America, Inc. effective January 1, 2015.

DECLARATION OF ABHIRAM REDDY YERRAMADDU   **PAGE 1**

Epic model, sold by Sprint. I am qualified to conduct field and lab testing of smartphones, including the Samsung Galaxy S model, to determine the root cause of any verified performance issues, and to report on the results of that testing.

4.   In conducting the testing of smartphones, including the Samsung Galaxy S model, and on identifying the root cause of any verified performance issues, I rely on my formal education, skill, knowledge and my work experience accumulated over the past four and a half years.

5.   I have worked at Samsung since June 2012. One hundred percent (100%) of my job responsibilities at Samsung are devoted to testing smartphones and mobile devices both before they are launched ("pre-launch") and after they are launched into the marketplace ("post-launch"). I have tested hundreds of smartphones for wireless carriers, including the Samsung Galaxy S Epic and Fascinate models.

6.   I personally conduct the testing of smartphones myself. I also supervise a group of Samsung engineers and technicians that tests smartphones. My skills and experience are not specifically limited to software testing, but rather encompass testing of a smartphone's overall performance, including hardware and software.

7.   In connection with my duties at Samsung, I perform pre-launch testing of smartphones in accordance with the wireless carriers (Verizon, Sprint, T-Mobile and AT&T) and Samsung's specifications to ensure that the phones are suitable for release to the marketplace.

8.   Specifically, during pre-launch testing, I test the entire functionality of the smart phone, including but not limited to the phone powering on and off, wireless carrier network connectivity, internet connectivity, making calls, receiving calls, sending and receiving text messages, sending and receiving emails, phone applications, waking from sleep mode, power

consumption, voltage measurement, Bluetooth operation, battery performance, volume and voice data ("phone functionality"). For pre-launch testing, the wireless carrier that will offer the Samsung smartphone also provides my team and me with performance standards that the smartphone must meet prior to being launched to the marketplace, such as voice quality, data consumption, data throughput, data network selection, call processing and cell selection.

9.   I conduct pre-launch testing of smartphones in the field and in a lab. For lab testing, my team and I travel to the wireless carrier lab location and conduct the testing of the phones there. In the carrier lab, we test smartphones in a simulated environment that connects to the carrier's wireless network and tests the phone's functionality. During lab testing, we may also use equipment such as the Spirent Nomad system to measure voice quality and call performance testing. To further ensure smartphone product quality, my team and I also perform pre-launch testing in the field in order to measure the phone's functionality under normal and abnormal operating conditions.

10.   Part of my job responsibilities at Samsung also involves post-launch testing of smartphones (in the field and in a lab) to verify any consumer reported performance issues of a particular device and to identify the root cause of such performance issues.

11.   I have performed smartphone post-launch testing with wireless carriers and a chipset provider in order to verify alleged performance issues. My post-launch testing responsibilities include attempting to reproduce alleged performance issues reported by consumers to their carriers (Verizon, AT&T, Sprint and T-Mobile) and to Samsung regarding their smartphones, including Samsung Galaxy S phones. Such consumer returns allege many different types of performance issues including but not limited to, power recycling, rebooting,

freezing, powering off, missed calls, and failure to wake from sleep mode. Such performance issues potentially have many different root causes.

12.   To determine the root cause of a performance issue with a smartphone, it is necessary to test the performance of that particular device and to inspect the interior and exterior of such device for any damage. After testing smartphones, I would report to the wireless carrier the test results, including any reproduction of any performance issue, any damage to the exterior or interior of the device, and the root cause of any verified performance issue.

13.   Once my team and I verify a performance issue and identify its root cause, we inform Samsung Research and Development, which will then determine the appropriate corrective action for that device.

14.   Part of my technical experience also includes working as a mobile software engineer for Motorola Mobility Inc. USA ("Motorola") from August 2010 through June 2012. In that capacity, I conducted numerous performance tests on mobile device hardware and software, including smartphones, in the field and in a lab.

15.   In connection with my work at Motorola, I reviewed AT&T, T-Mobile and Verizon's requirements and support for field testing and submitted detailed reports with my analysis of mobile device testing results to those wireless carriers.

16.   My job duties for the past four and half years have involved nothing but testing smartphones and other mobile devices for performance issues. Through my education, knowledge, skill and work experience, I developed expertise in identifying damage on consumer returned smartphones, and I developed expertise in determining root causes of performance issues, including liquid damage, hardware and software root causes. As part of my responsibilities testing smartphones, I reported to wireless carriers any liquid damage discovered

DECLARATION OF ABHIRAM REDDY YERRAMADDU   PAGE 4

in printed circuit boards, chipsets and other hardware components and whether such liquid damage was the root cause of a performance issue. Wireless carriers and Samsung rely on my expertise and experience in verifying any performance issues during my testing of smartphones and in identifying the root cause of such performance issues.

17.   A more detailed account of my work experiences and qualifications is listed in my resume. A true and correct copy of my resume is attached as Exhibit A to this declaration.

18.   My duties as a Senior System/Software Test Engineer for Samsung do not involve regularly giving expert testimony nor have I served as an expert witness for Samsung in the past.

19.   I was not retained or specially employed to provide expert testimony in this case. I am not being compensated as an expert witness for the testing of Plaintiffs' smartphones that I performed in this case from August 26-28, 2014. I have never testified as an expert witness at trial or a deposition.

20.   The results of Plaintiffs' smartphone testing that I performed with Jay Amin were contained in the August 26-28, 2014 Testing Log Sheets. The information contained in the Testing Log Sheets is based on my observation of the Plaintiffs' smartphones' functionality during the August 26-28, 2014 testing that I performed with Mr. Amin.

21.   I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct to the best of my knowledge.

Executed in Middlesex County, State of New Jersey on February 6, 2015.
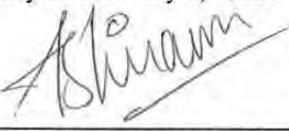
_____
ABHIRAM REDDY YERRAMADDU

Abhiram Reddy Yerramaddu
Phone: 908 328 5963
ymabhiramreddy@gmail.com

Summary:

- 4 Year of experience as a Senior Software Test Engineer in **Motorola Mobility/Samsung Telecommunications** Software Product Quality Assurance Department validating the Carrier specific testing standards.
- Experience in working with wireless protocols (**SUPL**,RRLP & RRC)on mobile phones and knowledge of 3GPP standards.
- Proficient with simulator test systems like **Spirent ULTS** system, **Anite 9000**, **Anritsu W-CDMA Signaling tester**, **Agilent8960**, **Rhode & Schwarz**: Universal Protocol tester & **PQA** system, **Rhode & Schwarz CMW-500**, CMU200, Spirent SR3420.
- Experience in testing of Location Based Services. Ability to analyze and debug GPS and GLONASS related issues.
- Hands on experience in post processing of KPIs, Test case execution in live network, Issue reporting, writing test cases and traveling to customer location for reproduction of issues and preparing reports and presenting them.
- Experience in performing automation testing for various devices and tablets using T-Set Automation tool.
- Experience in protocol verification testing for OEM's like SAMSUNG as well as Network optimization testing for carrier such as Verizon, Sprint, T-Mobile and AT&T.
- Experience in Carrier Validation, **Conformance**, **Regression, performance** testing and provide support for field test of A-GPS Android based Mobile handsets.
- Experience in writing and implementing Test Specifications, Test Plans & Test cases.
- Expertise in working on Qualcomm and ST Ericssion based Android Products.
- Good familiarity and well acquainted with Software Development Life Cycle (S.D.L.C).
- Experience in lab and field testing of LTE/IMS/VoLTE (VoIP over LTE) devices
- Hands on Experience with SIP/SDP/RTP/RTCP.
- Familiar with various IP networking protocols including TCP/IP, UDP, HTTP, and IP Multicast.

Skills:

Languages/Scripting	C, assembly for x86 family / Perl Script.
Operating systems	Windows, Linux, Android
Packages	MS-Office, VSS, understand C++ Editor
Wireless Protocols	GSM, GPRS, EDGE, UMTS, HSPA, LTE

EXHIBIT A

Wireless Tools and Systems	Anite 9000, Anritsu W-CDMA Signaling tester, Agilent8960, Rhode & Schwarz: Universal Protocol tester, CMW-500, CMU200, Spirent SR3420, QUALCOMM QXDM, QPST, Motorola RTA, Motorola RadioComm, Motorola RSDLite.
AGPS Protocols	SUPL, RRLP and RRC.
AGPS tools	Spirent UMTS Location test system (ULTS), Rhode & Schwarz Universal Protocol tester, Spirent STR4500, Spirent GSS6560, WinOncore12 2.4.1 Motorola MAPS (ASN.1), MotoSMIL, Motorola MTP, Motorola GPS Parser,

Education:

- **Jackson State University**, Jackson, MS
  Masters degree in **Computer Science** (May'10)

Professional Experience:

Samsung Telecommunications America, New Jersey   **June 2012 - Present**

Title: **Mobile Device SW Test Engineer & LTE/VOLTE Field Test Engineer**

- As part of the **SE** group my responsibilities include:
- Organizing the field testing team of 7 and Prioritizing the daily schedule depending on the request from HQ or from Carrier.
- Binary up gradation on different phones using ODIN or Samsung PST tool and training them in the tools to be used for the respective chipset.
- Writing Test cases for daily regression for UMTS and LTE.
- Field Protocol verification for projects including Verizon and AT&T.
- Reproduction of issues included from Verizon, AT&T Sprint devices upon request.
- Training all team members with following tools: QXDM, XCAL, Infineon logging tool, Next etc.
- Compiling, reporting results and raising Defects in PLM.
- During this experience gained Knowledge in LTE & UMTS messaging by studying logs provided by test team.

- Automation testing and profiling for performance issues like Power consumption, Memory leak, stress testing using tools: MAT, T-set, Power Monitor logs, DDMS, TCP dump, Show Frequency, PmTM.
- As a part of LTE field test team was responsible for LTE & UMTS protocol test for Samsung devices and tablets for AT&T carrier.
- Performed Full regression, IRAT, reproduction tests with Drive and static scenarios and reported to R&D team.
- Good hands on experience for QXDM tool, Mobile Analyzer, RDX tools used for log collection for varying chipsets.
- Performed joint test with carrier and chipset provider in terms of verifying the field issues.
- During this experience gained knowledge of LTE, UMTS architecture and signaling call flow.
- Performed lab and field testing of **LTE/IMS/VoLTE (VoIP over LTE)** devices
- Performed test plan/requirement documentation updates
- Hands on Experience with **SIP/SDP/RTP/RTCP**.
- Also part of execution, managing, and coordination of lab and field testing activities
  - Test coordination includes organizing and executing lab and field test activities with internal local teams as well device vendors and technology partners
- Executed test plans in the labs as well as field.
- Familiar with various IP networking protocols including **TCP/IP, UDP, HTTP, and IP Multicast**.
- Developed test plans related to **IMS/VoLTE/RCS/Messaging/Emergency Alerts**; update existing test plans and **VoIP Enhanced 9-1-1 services**
- Was part of VOLTE design and testing knowledge transfer to Client Network Engineering and Operations teams and also have Good knowledge of LTE and IMS call-flows.
- VOLTE Device log collection Tools , e.g., **QXDM, QCAT, Wireshark, Accuver XCAL Solo or XCAP**, or other equivalent software packages.

Tekmark Global Solutions, INC

Client: Motorola Mobility Inc, USA   **AUG 2010 – June 2012**

Title: **Mobile Software Test Engineer - Carrier Validation (CV Lab)**

This project involves testing of Mobile features as per carrier specifications and standards in Carrier Validation team

Software tools: C, Android, OMA Mobile Location Service Architecture SUPL 1.0 and SUPL2.0, Spirent UMTS Location test system (ULTS), Rohde & Schwarz location testing system, Rohde & Schwarz PQA system, Spirent STR4500,Spirent 8100, DDTS, iDART, Agilent 8960/9000 wireless communication test set, CMW-500, CMU200, Windows, Understand C++ Editor, QUALCOMM tools QXDM, QPST, Snapper, QRCT, QCAT and Motorola proprietary tools.
Protocols: SUPL, RRC & RRLP
Hardware: QUALCOMM MDM6600 Chipset, QUALCOMM MSM6246 Chipset, QSC6085, BCM4750, QUALCOMM 8960 chipset , ST Ericsson chipsets, Broadcom GPS chipsets.

Responsibilities involved:

- Feature Integration testing of 3GPP control plane protocol using Motorola proprietary test systems and Rhode & Schwarz test systems
- Conformance testing on Spirent ULTS and Regression testing of **SUPL** on Spirent ULTS and Motorola proprietary systems
- Execute performance (3GPP 34.171 and 51.010) and E911 tests on ULTS and Rhode & Schwarz.
- Performance tests such as:
  - 3G/2G performance in Indoor Scenario such as a Parking garage
  - 3G/2G performance in Deep Urban Scenario such as a Downtown
  - 3G/2G performance in Suburban Scenario
- Interact with GPS hardware team and assist them with generating Antenna pattern files using MATLAB based tool.
- Interact with chipset vendors for various technical issues (Open Service Requests with detailed information and participate in the conference calls).
- Participated in test execution of next generation SUPL 2.0
- Executed new Carrier requirements like:

- E911 CSFB call LTE Band to WCDMA Band.
- SUPL 2.0 300 NILR Immediate sessions RRLP positioning protocol in WCDMA/LTE mode with Hot Start/Cold start.

- Execute GMS(Google Maps) test cases.
- Field testing on live networks using AT&T, T-Mobile and Broadcom SUPL Servers.
- Analyze and debug GPS and GLONASS log failures for various issues and worked with the chipset vendors for resolution.
- Executed Device aggregation tests, Voice quality scenarios to ensure the UE meets AT&T's strict MOS requirements.
- Worked on **KPI** (Key Performance Indicators) tests like UE power up timing, call setup timing, call maintenance timing and other UE functionalities
- Verified the performance of the UE by executing CS/PS call scenarios, RF scenarios.
- Expertise in executing **LTE** tests :

  - LTE Data Performance Downlink/Uplink
  - LTE Inter / Intra RAT Mobility Handover
  - LTE Mobility Management
  - Network Selection LTE Inter/Intra RAT MM & GMM, Multiband support, PLMN Selection, Reject Cause, MM Rejection, Roaming Selection Service(RSS)
  - SON ANR Intra Freq & Inter Freq
  - Terminal CSFB
  - Terminal Radio Performance

- Review of AT&T, T-Mobile and Verizon requirements and support for the field test (Debugging and analyzing the failure logs). Submitted the detail report with my analysis to the Network carrier.
- Maintenance of Perl based test scripts, used to automate control of real-time devices
- Validate AT&T network requirements using automation tools Anite, Rohde and Schwarz, Spirent and Anritsu
- Execute AT&T **Application Protect the Network** (APTN) tests using R&S CMU-200.
- Expertise in executing rate matching (voice quality) and device aggression tests on the Spirent A304/604 test platform.
- Actively participate in product validation of AT&T, T-Mobile, Vodafone (Europe) and Telus (Canada) phones from Protect the Network to Technical Acceptance.
- Collaborate with project tracking, coordination and implementation testing (Test Central)

- Analyze SIM Layers (UICC SIM Card) using ORGA application (IT3 MOVE)
- Trace & analyze the logs executed during testing using QXDM and Android SDK Tool
- Communicate with the **Development Team** to fix the major issues and help them with Unit testing and Regression testing as required.
- Upgrading the handset software using Motorola RSD Lite and Android fastboot.

Personal skills:

Comprehensive problem solving abilities, excellent verbal and written communication skills, ability to deal with people diplomatically, willingness to learn, team facilitator, hard worker.

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

SHANE GALITSKI, RICHARD TALIAFERRO and BRIAN NEWBOLD, individually and on behalf of all others similarly situated,	§ § § § §	
Plaintiffs,	§ §	CIVIL ACTION NO.
vs.	§ §	3:12-cv-04782-D
SAMSUNG TELECOMMUNICATIONS AMERICA, LLC, a Delaware limited liability company,	§ § § § §	
Defendant.	§	

DECLARATION OF JAY AMIN

I, Jay Amin, hereby declare as follows:

1.   My name is Jay Amin. I am over eighteen years of age and I would be competent to testify as to the matters set forth herein if I am called upon to do so. I have personal knowledge of the facts stated herein.

2.   I am a Device Test Engineer with Samsung Electronics America, Inc. ("Samsung").[1] I earned a Bachelor's degree in Electrical Engineering from Gujarat University in India in June 2008, and a Master's degree in Electrical Engineering from the University of Bridgeport in Connecticut in December 2010.

3.   I am a technical expert in testing the performance of Samsung smartphones, including the Samsung Galaxy S Fascinate model, sold by Verizon, and the Samsung Galaxy S

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[1]   Samsung Telecommunications America, LLC merged with Samsung Electronics America, Inc. effective January 1, 2015.

DECLARATION OF JAY AMIN   PAGE 1

Epic model, sold by Sprint.   I am qualified to conduct field and lab testing of smartphones, including the Samsung Galaxy S model, and to report on the results of that testing.

4.   In conducting the testing of smartphones, including the Samsung Galaxy S model, and on reporting the results of such testing, I rely on my formal education, knowledge, skill and my work experience accumulated over the past three years in testing smartphones.

5.   I have worked at Samsung since March 2012 as a Device Test Engineer. As a Device Test Engineer with Samsung, I personally test approximately 100 smartphones per week. One hundred percent (100%) of my job responsibilities with Samsung are devoted to testing smartphones and mobile devices.

6.   I am responsible for post-launch testing of Samsung smartphones, including both hardware and software, returned by consumers due to an alleged performance issue ("post-launch testing"). My responsibilities include testing the stability and performance of smartphones for wireless carriers Sprint and Verizon. I have tested the Samsung Galaxy S Epic and Fascinate models after those models were launched. I am also responsible for testing alleged smartphone performance issues that consumers report on Verizon's online forums.

7.   In connection with my testing responsibilities, I attempt to reproduce alleged performance issues reported by consumers regarding their smartphones. Such consumer returns allege many different types of performance issues including but not limited to, power recycling, rebooting, freezing, powering off, missed calls, and failure to wake from sleep mode. Such performance issues may have many different root causes. To determine the root cause of a performance issue with a smartphone, it is necessary to test the performance of that particular device and to inspect the interior and exterior of such device for any damage.

DECLARATION OF JAY AMIN   **PAGE 2**

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8.   In order to verify an alleged performance issue, I test the entire functionality of the smartphone, including but not limited to the phone powering on and off, wireless carrier network connectivity, internet connectivity, making calls, receiving calls, sending and receiving text messages, sending and receiving emails, phone applications, waking from sleep mode, power consumption, voltage measurement, Bluetooth operation, battery performance, volume and voice data.

9.   If the smartphone testing verifies an alleged performance issue, I then attempt to identify the root cause of the performance issue. After conclusion of the testing, I report my findings to the wireless carrier and to Samsung's Research and Development group. Samsung Research and Development will then determine the appropriate corrective action for that device.

10.   Part of my technical experience also includes working as a radio frequency engineer for AT&T and T-Mobile in 2011. In that capacity, I verified smartphone call success rates and call drop rates as well as monitored data to improve dropped calls and blocked calls.

11.   My job responsibilities for approximately the past three years have involved nothing but testing smartphones and other mobile devices. Through my education, knowledge, skill and work experience, I developed expertise in identifying damage on consumer returned smartphones, and I developed expertise in determining root causes of performance issues, including liquid damage, hardware and software root causes. Wireless carriers and Samsung rely on my expertise and experience in verifying any performance issues during my testing of smartphones and in identifying the root cause of such performance issues.

12.   A more detailed account of my work experiences and qualifications is listed in my resume. A true and correct copy of my resume is attached as Exhibit A to this declaration.

DECLARATION OF JAY AMIN   **PAGE 3**

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13.   My duties as a Device Test Engineer for Samsung do not involve regularly giving expert testimony nor have I served as an expert witness for Samsung in the past. I have never testified as an expert witness at trial or in a deposition.

14.   I was not retained or specially employed to provide expert testimony in this case. I am not being compensated as an expert witness for the testing of smartphones that I performed in this case from August 26-28, 2014.

15.   The results of the Plaintiffs' smartphone testing that I performed with Abhiram Yerramadu were contained in the August 26-28, 2014 Testing Log Sheets. The information contained in the Testing Log Sheets is based on my observation of the Plaintiffs' smartphones' functionality during the August 26-28, 2014 testing that I performed with Mr. Yerramadu.

16.   I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct to the best of my knowledge.

Executed in Tarrant County, State of Texas on February _6_, 2015.

_____
JAY AMIN

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R. APP. 15
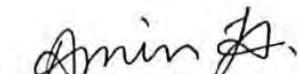
JAY AMIN

Email: jay_amin85@yahoo.com
Phone: (201)-888-6437

OBJECTIVE: Seeking for an opportunity of the **RF Device Test Engineer** in the required organization with a view to use my experience for the benefit of the organization.

WORK SUMMARY

- 3 years of professional experience working in telecom industry.
- Proficient in working with different live cellular network testing software tools such as TEMS, AGILENT and XCAL-X, QXDM. ETS.
- Mobile phone Pre Launch Testing of ANDOID 3G/4G phone, CDMA Mobile Phone (Mobile Phone Manual Testing & Testing with Tools.
- Skilled at voice and data testing procedure and performance indicators.
- Experience in collecting and analyze drive data and performance statistics.
- Proficient in Map reading and developing by using software tools like MapInfo Professional, Microsoft Street & Strips
- Coursework experience in designing different types of filters through MATLAB.
- Excellent communication and presentation skills combined with the strong analytical, organizational and problem solving skills.
- Able to take multi-faced responsibility including coordinating and directing all phases of project based efforts.
- Efficient in developing and documenting policies, procedures, project documentation, milestones and Specifications.

TECHNICAL EXPERTISE:

RF Technologies   : **GSM, CDMA, WCDMA, UMTS, TDMA, MIMO, EVDO, OFDM , HSDPA, wireless technology and protocols such as TCP/IP, UDP, HTTP, FTP.**
Tools   : **TEMS, Agilent, MapInfo 8.5, Street Atlas, Microsoft Streets and Trips**
Languages   : **Assembly Embedded C, ANSI C, C++.8085/86, 8051/52**
Operating Systems : DOS, MS Windows 98/2003/ XP/ VISTA, Internet browsers, antivirus software, remote access applications, backup systems

WORK EXPERENCE:

Samsung Telecommunication of America   **March 12– Current**
(A Client of Blue Telecom) Bridgewater, NJ
Device Test Engineer
Responsibilities

- Conduct necessary **regression-testing** of all modifications to **newly-launching devices** and devices in existing inventory.
- Performing various field testing of devices using QXDM, ETS & XCAL and collecting logs to review by Protocol engineers.
- Network interface testing and collecting logs **using AP Logs, Dump Logs, RDX tools(Extractor Tool for Ram Dump),TCP logs.**
- Conduct designated test plans to ensure all potential issues impacting Customer Care are tested prior to device launches including non-traditional areas such as PC driver problems, etc.
- Provide feedback within the Device Engineering team to exceed individual and group goals for performance and speed.
- Effective communications on device progress, issues, and solutions. Performed RF drive testing for CDMA as well LTE networks to carry out propagation and signal measurement.

EXHIBIT A

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- Successfully performed Voice call processing and Data throughput testing of CDMA as well as LTE handsets based on ANDROID OS in good and marginal coverage.
- Experienced in Data Analysis and Device Provisioning tools such as QXDM & QPST. Experienced in testing the stability and performance of the CDMA handset in designated areas and routes designed for operators like Verizon and Sprint benchmarking with a reference handset.
- Successfully performed Full Scale Testing, **Through Put Testing, Regression Testing, KPI Testing, Sanity Testing**, Performance Testing, and User Acceptance Testing. Successfully performed Testing of Phone Applications (e.g. Bluetooth, SMS, MMS, and Picture Mail) and Multi-media Features.

QA Testing duties & Responsibilities

- Handling Verizon QC: Device Forum (DF) and Post Launch issue forum (PIF).
- Issue reproduction on internal testing devices on customer specified models/binaries.
- Coordinating with R&D to analyze and fixe reproduced issue, customer complains.
- Clarifying Verizon /Customers, with details analysis of frequently asked questions about devices and applications user functionalities.
- Updating vender comments on QC and closing issue with valid clarification and fix.
- Issue reproduction on customer return devices, finding the Route Cause and dispatching the devices which issue to Samsung and follow up to actual cause and further response to such issues.

AT & T (A Client of Avion Systems, Inc.) Charlotte, NC   **Oct 11 – Dec 11**
Associate RF Engineer
Responsibilities

- Team member of AT&T UMTS Network Testing Group for collection of drive test data generated   using tools like TEMS, Agilent.
- RF Drive test for optimization of the UMTS networks. Collection of drive test logs using TEMS investigation & Agilent in 850 MHz and 1900 MHz network for Migration and up gradation of the sites.
- Testing includes analysis of voice/data call quality, signal strength, site scanning and throughput for the UMTS network.
- Verify Radio quality (BLER) requirement on several different radio services, Handover functionality performance, the network, site functioning properly, antenna positions, antenna directions or tilt and swapped feeders, neighbor relations list.
- Testing includes : **IRAT**(Inter-Radio Access Technology) testing, **911** testing, Stationary testing, **OCNS**(Orthogonal Channel Noise Simulator) test**, SSV**(Single Site Verification) test, Implementation of Hard hand downs between two carrier (**IFHO**) and hard hand off between two carriers of different switch (**ISSHO**) test, etc.
- Cluster Tests and Market Tests include scanning and determining the areas where the optimization is necessary and to locate the poor network points to avoid drop/block calls.
- Static Site testing includes handover between sectors and the strength of the particular sector at different locations near the site.
- Reviewing & validating drive test data log files using TEMS Software.
- Worked on TEMS Investigation, TEMS route analysis & Record wireless transmission of data of radio frequencies.
- Proficient with TEMS 8 and TEMPS 10&12 & MapInfo 8.5.

T-Mobile (A Client of Amirit Technologies, Inc.) NJ   **June 11 – Sep 11**
ASSOCIATE RF Engineer
Responsibilities:

- Perform Drive Test for 2G/UMTS/HSDPA Services by using Agilent.
- Determined problem sites by using network key performance indicators, drive test data and handled customer Complaints very effectively.

- Analysis for Call Drop and Call Setup Failure.
- Post Processing of Log Files.
- Monitored analyzed statistical and drive test data to improve system performance indicators such as dropped calls, blocked calls, orientation failures, hand-off features and to meet departmental goals.

AT&T (A Client of Avion Systems, Inc.) Charlotte, NC   **April 11 – May 11**
Drive Test Engineer
Responsibilities

- Data Collection Drops and Access failures Analysis for Project worked as Lead Tech and Driving Super LTE Clusters and Making Stationary testing and Shakedown for LTE Sites, Understanding DAS technology and testing.
- Responsible for resolving day to day technical issues and make suggestion for network Improvement.
- Verifying cell sites physically for sector and cable swap, orientation, tilt of antennas.
- Performed extensive mobility and stationary **LTE** tests (UL/DL) for equipment manufacturer Ericson, Samsung UE, and LTE Scanner.
- Mapped near cell, mid cell, cell for the required RSSI, CINR, RSRP and other parameters as per the **test** requirements.
- Made recommendations to improve KPI, coverage and dropped call rate.

T-Mobile (A Client of Amirit Technologies) NJ   **Oct 10 – March 11**
Associate RF Engineer
Responsibilities:
- Perform RF drive testing to carry out propagation and signal measurement
- Hands on experience on using Agilent 14.1 Investigation tool for drive tests like cluster drive test, SSV test, IFHO testing, IRAT testing.
- Verify radio quality (**BLER**) requirement on several different radio service.
- Verify Handover functionality performance.
- Used Microsoft Streets and trips for guiding my driver as a navigator during the drives
- Checking RF cluster performance
- Verify the network, site functioning properly, antenna positions, antenna directions or tilt and swapped feeder
- Identification and analysis of Call Drops, Block calls and Handover performance into active set.
- Collect scanner data (SC, RSCP and Ec/No, RSSI) for all the detected cells.
- Verify call success rate and call drop rate.
- Thorough Understanding and experience in analysis of **UMTS Network.**
- Perform an audit on power related parameter settings(Max output power, CPICH Power, AICH Power)
- Frequency scanning and Log file analysis using AGILENT.

EDUCATION:

M.S. in Electrical & Electronic Engineering   **GPA: 3.55**
University of Bridgeport, CT   **JAN 09 - DEC 10**

B.E. in Electrical Engineering   **GPA: 3.6**
Gujarat University, India   **JULY 04- JUN 08**

Key Projects

- **Frequency measurement and Protection Using 89c52 Microcontroller**
  By using the 89c52 microcontroller, we were continuously measuring the frequency and we can control steeper motor by varying frequency.

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

SHANE GALITSKI, RICHARD TALIAFERRO and BRIAN NEWBOLD, individually and on behalf of all others similarly situated,	§ § § § §	
Plaintiffs,	§ §	CIVIL ACTION NO.
vs.	§ §	3:12-cv-04782-D
SAMSUNG TELECOMMUNICATIONS AMERICA, LLC, a Delaware limited liability company,	§ § § §	
Defendant.	§ §	

DECLARATION OF ALAN DABDOUB

I, Alan Dabdoub, hereby declare as follows:

1.   My name is Alan Dabdoub. I am over the age of twenty-one, and I am competent to make this declaration. The facts stated in this declaration are within my personal knowledge and are true and correct.

2.   I am a Partner at Lynn Tilloston Pinker & Cox, LLP, counsel for Defendant in this action.

3.   On August 21, 2014, the testing protocol regarding Plaintiffs' phones was sent to Plaintiffs' counsel. Attached as Exhibit A is a true and correct copy of the testing protocol regarding Plaintiffs' phones that was sent to Plaintiffs' counsel on August 21, 2014.

4.   Attached as Exhibit B is a true and correct copy of the email from Mariela Cawthon, a paralegal in our office, attaching the Testing Log sheets from the August 26-August 29, 2014 testing of Plaintiffs' phones, that was sent to Plaintiffs' counsel on September 2, 2014. The Testing Log sheets are Bates Numbered SAMSUNG_GAL 787093-787151.

5.   Attached as Exhibit C is a true and correct copy of pages 1-5, 298-299 of the deposition

transcript of Joseph C. McAlexander.

6.   Attached as Exhibit D is a true and correct copy of Exhibit 14 to the deposition of Joseph

C. McAlexander.

7.   I declare under penalty of perjury under the laws of the United States that the foregoing is

true and correct.

Executed in Dallas County, State of Texas on February 9, 2015.

_____
ALAN DABDOUB

4823-2804-8417, v. 1

LynnTillotsonPinkerCox

ALAN DABDOUB
PARTNER

P 214 981 3818
F 214 981 3839
adabdoub@lynnllp.com

Lynn Tillotson Pinker & Cox, LLP
ATTORNEYS AND COUNSELORS
2100 Ross Avenue
Suite 2700
Dallas, Texas 75201
www.lynnllp.com

August 21, 2014

Via E-Mail To:
Jennifer MacPherson
DOYLE LOWTHER, LLP
10200 Willow Creek Road, Suite 150
San Diego, CA 02131

RE: *Shane Galitski, et al. v. Samsung Telecommunications America, LLC*;
Civil Action No. 3:12-cv-04782-D in the U.S. District Court for the Northern
District of Texas, Dallas Division

Dear Jennifer:

Pursuant to the Court's order granting Samsung Telecommunications America, LLC's motion for non-destructive testing, we provide you a reasonably specific description of the tests to be performed and the procedures to be followed.

A.   TESTING TO BE PERFORMED

1.   The testing of Plaintiffs' Smartphones (hereinafter "phones") shall be Non-Destructive and will occur over a period of 72 hours.

2.   Defendant may inspect the exterior of Plaintiffs' phones, and may inspect the interior of Plaintiffs' phones.

3.   Defendant may operate Plaintiffs' phones in accordance with the owner's manual as set forth in this paragraph, in order to observe a recurrence of the symptoms indicative of those alleged in Plaintiffs' Amended Complaint (Doc. #95). The operation of Plaintiffs' phones shall include the following:

   a.   Observing Plaintiffs' phones operate in the standby mode;

   b.   Placing phone calls, receiving phone calls;

   c.   Drafting and sending text messages, receiving and reading text messages;

   d.   Operating installed software applications known as "apps,";

   e.   Browsing the Internet, playing audio or visual files;

   f.   Taking photos;

EXHIBIT A

Jennifer MacPherson
August 21, 2014
Page 2

g.   Observing the Plaintiff's phones while they are in Standby Mode;

h.   Testing battery consumption while in sleep mode;

i.   Inspecting the interior;

j.   Checking which applications the user installed;

k.   Testing the build version of the software for signs of rooting;

l.   Testing the flow of current to determine whether the proper amount of voltage is being sent throughout;

m.   Checking the circuitry;

n.   Testing for abnormalities in the power consumption, including whether there is normal output at each power stage;

o.   Testing the following systems with Oscilloscope/multimeter: application system, call processor system, audio system, and power management system.

4.   Defendant may also access, copy and analyze the existing log files of Plaintiffs' phones, so long as Defendant does not alter the contents of the existing log files.

5.   Defendant may also access, copy and analyze log files that are modified or created during the course of testing Plaintiffs' phones.

6.   Defendant may test Plaintiffs' phones' circuitry.

B.   PROCEDURES TO BE FOLLOWED

1.   Defendant shall return Plaintiffs' phones to Plaintiffs immediately after the termination of the Testing Period, and Plaintiffs' phones shall be in the same condition that Plaintiffs' phones were in before being provided to Defendant. Defendant shall not perform any of the following actions on Plaintiffs' phones:

a.   replace, repair or modify hardware,

b.   install any hardware,

c.   download, install, update, upgrade, delete, or otherwise modify, replace or repair any software or firmware, or

d.   improve, repair, correct, or perform any similar modification to hardware, software, or firmware.

Jennifer MacPherson
August 21, 2014
Page 3

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2. Should Plaintiffs' phones not currently have a SIM Card with access to the Verizon or Sprint networks, Defendant may use its own SIM Card in order to obtain network access.

3. No one other than Defendant may test Plaintiffs' phones.

4. Defendant's expert witness may attend the testing.

5. The phones may only be disassembled on an anti-static workshop.

6. Plaintiffs' counsel shall attend and observe all testing of Plaintiffs' phones.

7. The testing shall involve the use of a Faraday cage or screen room to ensure that, when the phones are turned on for the first time, they cannot connect to the network and receive an update.

8. Before testing begins, all participants shall remove personal devices (e.g. cell phones and personal hot spots) that could convey signals to the devices being tested.

9. Each mobile device will be backed up before testing begins.

10. The testing of the phones shall be videotaped.

11. Defendant shall preserve any data or files extracted, copied, obtained, or otherwise accessed from Plaintiffs' phones.

The testing will occur in the Willow conference room of the Klein Building at the Samsung Telecommunications America facility, 1000 Klein Road, Plano, Texas.

Please let me know if you have any questions.

Sincerely,
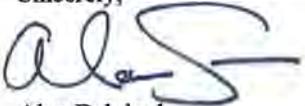
Alan Dabdoub

AD:sb

Cc: William J. Doyle, II
     bill@doylelowther.com
     James R. Hail
     jim@doylelowther.com
     DOYLE LOWTHER, LLP

Jennifer MacPherson
August 21, 2014
Page 4

Marc R. Stanley
marcstanley@mac.com
Martin Woodward
mwoodward@stanleyiola.com
Scott Kitner
Skitner@stanleyiola.com
STANLEY LAW GROUP

Alan M. Mansfield
alan@clgca.com
THE CONSUMER LAW GROUP OF CALIFORNIA

Thomas E. Glynn
tom@glynnlawgroup.com
GLYNN LAW GROUP

Ekwan E. Rhow
eer@birdmarella.com
David I. Hurwitz
dih@birdmarella.com
BIRD, MARELLA, BOXER, WOLPERT, NESSIM, DROOKS & LINCENBERG, P.C.

4814-8528-1053, v. 2

Alan Dabdoub

From:	Mariela Cawthon
Sent:	Tuesday, September 02, 2014 1:38 PM
To:	Jim Hail (jim@doylelowther.com); bill@doylelowther.com; tom@glynnwgroup.com; alan@clgca.com; marcstanley@mac.com
Cc:	Sherri Byrd; Alan Dabdoub; John Volney; Susan Davis
Subject:	Samsung /Galitski - Supplemental Production by Samsung
Attachments:	SAMSUNG_GAL 787093-SAMSUNG_GAL 787121.pdf; SAMSUNG_GAL 787122-SAMSUNG_GAL 787151.pdf; SAMSUNG_GAL 787152-SAMSUNG_GAL 787186.pdf

Counsel,

Attached please find Samsung's supplemental production, Bates-labeled SAMSUNG_GAL 787093 - SAMSUNG_GAL 787186. Please note these documents have been marked Confidential.

Should you have any questions, please feel free to contact Mr. Dabdoub or Mr. Volney.

Regards,

Mariela Cawthon
BOARD CERTIFIED PARALEGAL - CIVIL TRIAL LAW
TEXAS BOARD OF LEGAL SPECIALIZATION
....
LynnTillotsonPinkerCox, LLP
2100 Ross Avenue
Suite 2700
Dallas, Texas 75201
P 214 981 3836
F 214 981 3839
www.lynnllp.com
mcawthon@lynnllp.com

1

EXHIBIT B

R. APP. 25

```
 1              McALEXANDER - 12/4/2014
 2       IN THE UNITED STATES DISTRICT COURT
 3       FOR THE NORTHERN DISTRICT OF TEXAS
 4               DALLAS DIVISION
 5
    SHANE GALITSKI, RICHARD      )
 6  TALIAFERRO and BRIAN         )
    NEWBOLD, Individually and    )
 7  on Behalf of All Others      )
    Similarly Situated,          )
 8                               )
              Plaintiffs,        )
 9                               )
    VS                           ) Case No.
10                               ) 3:12-CV-4782-D
    SAMSUNG TELECOMMUNICATIONS   )
11  AMERICA, LLC,                )
                                 )
12            Defendant.         )
13
    ***********************************************
14
          ORAL VIDEOTAPED DEPOSITION OF
15
          JOSEPH McALEXANDER, III
16
             DECEMBER 4, 2014
17
    ***********************************************
18
19
20
21
22
23
24  Reported by:  Susan S. Klinger, RMR-CRR, CSR
25  Job No. 87157
```

EXHIBIT C

R. APP. 27

Page 2

1   McALEXANDER - 12/4/2014

2

3   December 4, 2014

4   10:10 a.m.

5

6

7

8   ORAL DEPOSITION OF JOSEPH McALEXANDER,

9   III, produced as a witness at the instance of

10   the Plaintiffs, and duly sworn, was taken in

11   the above-styled and numbered cause on the 4th

12   of December, 2014, from 10:10 to 6:45, before

13   Susan S. Klinger, RMR-CRR, CSR in and for the

14   State of Texas and California, reported by

15   stenographic method, at 2100 Ross Avenue,

16   Dallas, Texas, pursuant to the Federal

17   Rules of Civil Procedure and the provisions

18   stated on the record or attached hereto.

19

20

21

22

23

24

25

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 1                    McALEXANDER - 12/4/2014
 2                  A P P E A R A N C E S
 3
      FOR THE PLAINTIFF(S):
 4        Mr. John Lowther
          DOYLE LOWTHER
 5        10200 Willow Creek Road
          San Diego, California  92131
 6    and
 7        Mr. Scott Kitner
 8        STANLEY IOLA
          3100 Monticello Avenue
 9        Dallas, Texas  75205
10
11    FOR THE DEFENDANT(S):
12        Mr. Alan Dabdoub
13        LYNN TILLOTSON PINKER & COX
          2100 Ross Avenue
14        Dallas, Texas  75201
15
16    ALSO PRESENT:
17        Mr. Chase Huddleston, videographer
18
19
20
21
22
23
24
25
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Page 4

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1                  McALEXANDER - 12/4/2014
2                      I N D E X
3    WITNESS                              PAGE
4    JOSEPH McALEXANDER, III
5    EXAMINATION BY MR. LOWTHER              7
6    EXAMINATION BY MR. DABDOUB            296
7    EXAMINATION BY MR. LOWTHER            311
8
9                  E X H I B I T S
10
11   No.         Page        Description
12   Exhibit 1    9          Rothbaum report,
13                           SAMSUNG_GAL 787325
14   Exhibit 2    10         Galitsky report, 10/22/14
15   Exhibit 3    21         CD production documents
16   Exhibit 4    21         Subpoena
17   Exhibit 5    22         Samsung's responses to
18                           the Sixth Requests for
19                           Production
20   Exhibit 6    68         Answer to Amended
21                           Complaint
22   Exhibit 7    96         Email, SAMSUNG_GAL 083898
23   Exhibit 8   122         Captivate chart,
24                           SAMSUNG_GAL 0002694
25
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R. APP. 29

Page 5

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 1                  McALEXANDER - 12/4/2014
 2      Exhibit 9   123        Victory chart,
 3                              SAMSUNG_GAL 0002695
 4      Exhibit 10  123        Vibrant chart,
 5                              SAMSUNG_GAL 0002696
 6      Exhibit 11  123        Fascinate chart,
 7                              SAMSUNG_GAL 0002697
 8      Exhibit 12  124        Email, SAMSUNG_GAL 428812
 9      Exhibit 13  127        Portion of a contract,
10                              SAMSUNG_GAL 773937
11      Exhibit 14  162        Graph, SAMSUNG_GAL 788701
12      Exhibit 15  183        Flash, SAMSUNG_GAL 002344
13      Exhibit 16  187        Ops News Brief,
14                              SAMSUNG_GAL 0002345
15      Exhibit 17  191        1500 Fascinate EWP Report
16      Exhibit 18  198        MAX8998, MAXIM_000075
17      Exhibit 19  199        MAX8998,
18                              SAMSUNG GAL 0002640
19      Exhibit 20             Testing log sheet,
20                              APP.752
21      Exhibit 21             Tutorial 986, 7/17/02
22
23
24
25
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R. APP. 30

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1              McALEXANDER - 12/4/2014
2   this case --
3      A.    No.
4      Q.    -- to your knowledge?
5      A.    To my knowledge, there is no
6   reference to that here.
7      Q.    Earlier -- you also had mentioned
8   earlier 5 percent of the phones when you were
9   describe -- when you were asked questions about
10  Exhibit 7.  Could you turn to the first page,
11  please, sir, of that Exhibit 7.
12     A.    All right.
13     Q.    And do you see anything about 5
14  percent in here, or does it just indicate
15  five --
16     A.    There were five --
17     Q.    -- resets/crashes?
18     A.    Excuse me.  In the first two
19  sections it indicates five resets and
20  approximately 20 hours and five resets/crashes.
21     Q.    So it doesn't say anything about 5
22  percent; correct?  I just want to get a
23  clarification for the record.
24     A.    No, it does not.  It's five resets.
25     Q.    Okay.  Let me direct you to
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Page 299

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1              McALEXANDER - 12/4/2014
2    paragraph 69 in your report, just for the
3    purpose of correcting a typo.
4         A.   Which paragraph again?
5         Q.   Paragraph 69 of your report on page
6    31.
7         A.   Okay.
8         Q.   The first sentence.
9         A.   I see it.
10        Q.   Is that -- can you clarify for us
11   and correct the typo based on the source
12   document, which is Bates number Samsung GAL
13   787649?
14        A.   The last -- the date on this, the
15   end of the first sentence, which reads December
16   2005.  I believe that should be -- I'll
17   verify -- June of 2012, I believe is the date.
18   Because the last one was May of 2012, so that
19   would be through at least May of 2012.
20        Q.   Okay.  And that's the source
21   document that you were asked questions about by
22   opposing counsel earlier, Bates number --
23        A.   Yes.
24        Q.   -- Samsung GAL 787649?
25        A.   Yes, that is correct.
```

R. APP. 32

EXHIBIT D

R. APP. 33

Case 3:12-cv-04782-D   Document 184-1   Filed 02/09/15   Page 36 of 37   PageID 5789

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

SHANE GALITSKI, RICHARD TALIAFERRO and BRIAN NEWBOLD, individually and on behalf of all others similarly situated,	§ § § § § §	
Plaintiffs,	§ §	CIVIL ACTION NO.
vs.	§ §	3:12-cv-04782-D
SAMSUNG TELECOMMUNICATIONS AMERICA, LLC, a Delaware limited liability company,	§ § § §	
Defendant.	§ §	

DECLARATION OF STEPHEN COLE

I, Stephen Cole, hereby declare as follows:

1.   My name is Stephen Cole. I am over the age of twenty-one, and I am competent to make this declaration. The facts stated in this declaration are within my personal knowledge and are true and correct.

2.   I am an associate at the law firm of Lynn Tilloston Pinker & Cox, LLP, counsel for Defendant in this action.

3.   I attended the testing of the Plaintiffs' devices, which occurred from August 26, 2014 and ended on August 29, 2014. The tests were conducted at Samsung's facility at 1000 Klein Road, Plano, Texas 75074.

4.   I was present during all active testing of Plaintiffs' devices.

5.   Counsel for Plaintiffs was present during all active testing of Plaintiffffs' devices.

DECLARATION OF STEPHEN COLE   **PAGE 1**

6.   I declare under penalty of perjury under the laws of the United States that the

foregoing is true and correct.

Executed in Dallas County, State of Texas on February 9, 2015.

Stephen Cole